

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
YONGPING WANG :
DEBTOR :
: **BANKRUPTCY NO.: 19-16681- AMC**

**RESPONSE TO CERTIFICATION OF DEFAULT BY DEUTSCHE BANK NATIONAL
TRUST COMPANY**

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Deutsche Bank National Trust Company's (Movant) Motion, respectfully represents that Debtor has paid to the Movant the amount alleged to be in default. Said funds were paid via certified funds and were placed in the mail on March 1, 2024.

WHEREFORE, Debtor prays for a hearing to be set on this matter, by which time Debtor's account will be fully current.

Date: March 1, 2024

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire
bperloff@perlofflaw.com
215-287-4231
Attorney for Debtor